

# **EXHIBIT G**

DEFENDANTS' AFFIRMATIVE DEPOSITION DESIGNATIONS FOR STACEY HARPER-AVILLA					
DEPO DATE	DESIGNATION TYPE	DEFENDANTS' AFFIRMATIVE DESIGNATIONS			
		Begin Page at	Begin Line at	End Page at	End Line at
4/11/2019	All Def Affirm	16	11	16	12
4/11/2019	All Def Affirm	16	17	16	19
4/11/2019	Pharm Affirm	16	17	16	19
4/11/2019	All Def Affirm	17	18	17	25
4/11/2019	All Def Affirm	18	1	18	8
4/11/2019	All Def Affirm	18	19	18	25
4/11/2019	All Def Affirm	19	1	19	9
4/11/2019	All Def Affirm	19	17	19	25
4/11/2019	All Def Affirm	20	1	20	15
4/11/2019	All Def Affirm	21	18	22	18
4/11/2019	All Def Affirm	22	22	23	16
4/11/2019	All Def Affirm	29	20	30	17
4/11/2019	All Def Affirm	31	3	31	7
4/11/2019	McKesson Affirm	31	10	31	14
4/11/2019	CAH Affirm	31	10	31	14
4/11/2019	CAH Affirm	31	17	31	21
4/11/2019	McKesson Affirm	31	17	31	25
4/11/2019	CAH Affirm	31	23	31	25
4/11/2019	McKesson Affirm	32	2	32	3
4/11/2019	CAH Affirm	32	2	32	3
4/11/2019	All Def Affirm	32	20	33	2
4/11/2019	McKesson Affirm	33	13	33	23
4/11/2019	All Def Affirm	34	2	34	16
4/11/2019	All Def Affirm	34	21	35	5
4/11/2019	All Def Affirm	35	13	35	24
4/11/2019	All Def Affirm	36	10	36	14
4/11/2019	All Def Affirm	36	17	37	5
4/11/2019	All Def Affirm	39	20	39	22
4/11/2019	All Def Affirm	39	25	39	25
4/11/2019	All Def Affirm	40	10	40	20
4/11/2019	All Def Affirm	40	24	40	25
4/11/2019	All Def Affirm	41	3	41	5
4/11/2019	All Def Affirm	41	13	42	24
4/11/2019	All Def Affirm	43	3	43	4
4/11/2019	All Def Affirm	43	6	44	4
4/11/2019	All Def Affirm	44	7	44	16
4/11/2019	All Def Affirm	44	21	44	25
4/11/2019	All Def Affirm	45	9	45	12
4/11/2019	All Def Affirm	46	1	46	4
4/11/2019	All Def Affirm	46	6	46	15
4/11/2019	All Def Affirm	46	17	46	20
4/11/2019	All Def Affirm	46	24	47	13
4/11/2019	All Def Affirm	47	22	47	25
4/11/2019	All Def Affirm	48	1	48	1
4/11/2019	All Def Affirm	48	4	48	10

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DEPO DATE	DESIGNATION TYPE	DEFENDANTS' AFFIRMATIVE DESIGNATIONS			
		Begin Page at	Begin Line at	End Page at	End Line at
4/11/2019	All Def Affirm	48	11	48	14
4/11/2019	All Def Affirm	49	3	49	7
4/11/2019	All Def Affirm	49	8	49	11
4/11/2019	All Def Affirm	50	2	52	24
4/11/2019	All Def Affirm	53	1	53	7
4/11/2019	All Def Affirm	53	9	53	15
4/11/2019	All Def Affirm	53	17	53	18
4/11/2019	All Def Affirm	54	12	54	14
4/11/2019	All Def Affirm	54	19	54	19
4/11/2019	All Def Affirm	54	21	54	23
4/11/2019	All Def Affirm	55	1	55	1
4/11/2019	All Def Affirm	55	3	55	6
4/11/2019	All Def Affirm	55	9	55	10
4/11/2019	All Def Affirm	55	12	55	20
4/11/2019	All Def Affirm	55	23	56	5
4/11/2019	All Def Affirm	56	7	56	9
4/11/2019	All Def Affirm	56	11	57	3
4/11/2019	All Def Affirm	57	14	57	18
4/11/2019	All Def Affirm	57	19	58	10
4/11/2019	All Def Affirm	58	13	59	4
4/11/2019	All Def Affirm	60	16	60	24
4/11/2019	All Def Affirm	61	1	61	1
4/11/2019	All Def Affirm	61	16	62	1
4/11/2019	All Def Affirm	62	7	62	10
4/11/2019	All Def Affirm	62	12	62	19
4/11/2019	All Def Affirm	62	21	62	22
4/11/2019	All Def Affirm	63	21	63	25
4/11/2019	All Def Affirm	64	2	64	3
4/11/2019	All Def Affirm	64	5	64	7
4/11/2019	All Def Affirm	64	9	64	11
4/11/2019	All Def Affirm	64	13	64	14
4/11/2019	All Def Affirm	64	16	64	16
4/11/2019	All Def Affirm	66	20	67	4
4/11/2019	All Def Affirm	68	12	68	25
4/11/2019	All Def Affirm	69	13	70	17
4/11/2019	All Def Affirm	71	6	71	21
4/11/2019	All Def Affirm	71	24	71	24
4/11/2019	All Def Affirm	72	1	72	5
4/11/2019	All Def Affirm	72	7	72	11
4/11/2019	All Def Affirm	72	13	73	1
4/11/2019	All Def Affirm	73	3	73	4
4/11/2019	All Def Affirm	73	23	74	15
4/11/2019	All Def Affirm	75	20	76	5
4/11/2019	All Def Affirm	76	7	76	15
4/11/2019	All Def Affirm	77	1	77	5

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DEPO DATE	DESIGNATION TYPE	DEFENDANTS' AFFIRMATIVE DESIGNATIONS			
		Begin Page at	Begin Line at	End Page at	End Line at
4/11/2019	McKesson Affirm	80	4	80	16
4/11/2019	CAH Affirm	80	4	80	16
4/11/2019	All Def Affirm	81	14	81	25
4/11/2019	All Def Affirm	82	1	82	16
4/11/2019	All Def Affirm	82	18	82	18
4/11/2019	All Def Affirm	82	20	83	5
4/11/2019	All Def Affirm	83	11	83	25
4/11/2019	All Def Affirm	84	4	84	9
4/11/2019	All Def Affirm	84	18	84	20
4/11/2019	All Def Affirm	84	21	85	4
4/11/2019	Pharm Affirm	85	15	85	18
4/11/2019	Pharm Affirm	85	20	85	20
4/11/2019	Pharm Affirm	85	22	86	2
4/11/2019	All Def Affirm	89	4	89	8
4/11/2019	All Def Affirm	89	11	89	13
4/11/2019	All Def Affirm	89	15	89	19
4/11/2019	All Def Affirm	89	23	90	1
4/11/2019	All Def Affirm	90	3	90	7
4/11/2019	All Def Affirm	90	10	90	12
4/11/2019	All Def Affirm	91	3	91	15
4/11/2019	All Def Affirm	91	19	91	21
4/11/2019	All Def Affirm	91	22	92	1
4/11/2019	All Def Affirm	92	6	92	6
4/11/2019	All Def Affirm	92	20	92	24
4/11/2019	All Def Affirm	93	1	93	2
4/11/2019	All Def Affirm	93	4	94	4
4/11/2019	All Def Affirm	94	10	94	11
4/11/2019	All Def Affirm	95	5	95	9
4/11/2019	All Def Affirm	95	13	95	16
4/11/2019	All Def Affirm	96	6	96	7
4/11/2019	All Def Affirm	96	8	96	11
4/11/2019	All Def Affirm	96	13	96	15
4/11/2019	All Def Affirm	96	24	97	9
4/11/2019	All Def Affirm	97	11	97	13
4/11/2019	All Def Affirm	97	15	98	11
4/11/2019	All Def Affirm	98	17	98	20
4/11/2019	All Def Affirm	98	23	98	24
4/11/2019	All Def Affirm	99	1	99	15
4/11/2019	All Def Affirm	99	17	99	17
4/11/2019	All Def Affirm	99	19	100	3
4/11/2019	All Def Affirm	100	5	100	6
4/11/2019	All Def Affirm	100	8	100	14
4/11/2019	All Def Affirm	104	21	105	6
4/11/2019	All Def Affirm	105	9	106	5
4/11/2019	All Def Affirm	106	16	106	18

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DEPO DATE	DESIGNATION TYPE	DEFENDANTS' AFFIRMATIVE DESIGNATIONS			
		Begin Page at	Begin Line at	End Page at	End Line at
4/11/2019	All Def Affirm	106	22	106	23
4/11/2019	All Def Affirm	106	25	107	1
4/11/2019	All Def Affirm	107	4	107	6
4/11/2019	All Def Affirm	107	8	107	11
4/11/2019	All Def Affirm	107	13	107	14
4/11/2019	Pharm Affirm	107	16	108	3
4/11/2019	All Def Affirm	109	1	109	16
4/11/2019	All Def Affirm	109	20	109	21
4/11/2019	All Def Affirm	109	23	110	3
4/11/2019	All Def Affirm	110	5	110	6
4/11/2019	All Def Affirm	110	8	110	10
4/11/2019	All Def Affirm	110	12	110	15
4/11/2019	All Def Affirm	110	16	111	4
4/11/2019	Pharm Affirm	111	15	111	18
4/11/2019	Dist Affirm	111	15	111	18
4/11/2019	Pharm Affirm	111	20	111	21
4/11/2019	Dist Affirm	111	20	111	21
4/11/2019	Pharm Affirm	111	23	112	1
4/11/2019	Dist Affirm	111	23	112	1
4/11/2019	Pharm Affirm	112	4	112	7
4/11/2019	Dist Affirm	112	4	112	7
4/11/2019	Pharm Affirm	112	9	112	18
4/11/2019	Dist Affirm	112	9	112	18
4/11/2019	Pharm Affirm	112	21	112	24
4/11/2019	Dist Affirm	112	21	112	24
4/11/2019	Pharm Affirm	113	1	113	1
4/11/2019	Dist Affirm	113	1	113	1
4/11/2019	Pharm Affirm	113	3	113	6
4/11/2019	Dist Affirm	113	3	113	6
4/11/2019	Pharm Affirm	113	9	113	9
4/11/2019	Dist Affirm	113	9	113	9
4/11/2019	All Def Affirm	113	11	113	19
4/11/2019	All Def Affirm	113	21	113	21
4/11/2019	All Def Affirm	113	23	114	2
4/11/2019	All Def Affirm	114	3	114	16
4/11/2019	McKesson Affirm	124	8	124	12
4/11/2019	McKesson Affirm	125	20	125	23
4/11/2019	CAH Affirm	125	20	125	23
4/11/2019	McKesson Affirm	125	25	125	25
4/11/2019	CAH Affirm	125	25	125	25
4/11/2019	McKesson Affirm	126	2	126	17
4/11/2019	CAH Affirm	126	2	126	17
4/11/2019	McKesson Affirm	127	4	127	9
4/11/2019	CAH Affirm	127	4	127	9
4/11/2019	McKesson Affirm	127	12	127	14

DEFENDANTS' AFFIRMATIVE DEPOSITION DESIGNATIONS FOR STACEY HARPER-AVILLA					
DEPO DATE	DESIGNATION TYPE	DEFENDANTS' AFFIRMATIVE DESIGNATIONS			
		Begin Page at	Begin Line at	End Page at	End Line at
4/11/2019	CAH Affirm	127	12	127	25
4/11/2019	McKesson Affirm	127	23	127	25
4/11/2019	McKesson Affirm	128	2	128	4
4/11/2019	CAH Affirm	128	2	128	4
4/11/2019	McKesson Affirm	129	13	129	24
4/11/2019	McKesson Affirm	130	1	130	2
4/11/2019	McKesson Affirm	130	4	130	7
4/11/2019	McKesson Affirm	130	23	130	24
4/11/2019	McKesson Affirm	131	3	131	5
4/11/2019	McKesson Affirm	131	7	131	7
4/11/2019	McKesson Affirm	131	10	131	11
4/11/2019	McKesson Affirm	131	22	132	25
4/11/2019	McKesson Affirm	133	5	133	9
4/11/2019	All Def Affirm	156	16	157	1

PLAINTIFFS' OBJECTIONS TO DEFENDANTS' AFFIRMATIVE DESIGNATIONS				
Start Page	Start Line	End Page	End Line	Note
17	18	17	18	Plaintiffs object to the extent that certain Defendant deposition designations of the DEA depositions and certain 30(b)(6) depositions are duplicative of one another. Plaintiffs further object to any testimony by current or former DEA agents designated by the Defendants to the extent that such testimony seeks to define what the law requires or whether Defendants' conduct violated or did not violate the law, as such testimony would invade the province of the jury.
18	19	19	9	doesn't accurately describe authorization of witness, vague, broad
31	3	31	7	vague, speculative
33	13	33	23	vague, confusing
35	1	35	24	speculative, compound, vague, confusing, foundation, relevance
36	10	35	5	vague, speculative, confusing, foundation, overbroad, relevance
39	20	39	25	vague, speculative, confusing, foundation, overbroad, relevance
40	2	40	8	vague, speculative, confusing, foundation, overbroad, relevance
42	22	43	4	speculative, vague, foundation
45	9	45	17	relevance, scope, overbroad, vague, foundation, speculative
46	1	46	8	relevance, scope, overbroad, vague, foundation, speculative
52	23	56	9	vague, speculative, confusing, foundation, overbroad, relevance
59	14	59	22	relevance, scope, overbroad, vague, foundation, speculative
60	16	61	1	relevance, scope, overbroad, vague, foundation, speculative
61	22	62	6	relevance, scope, overbroad, vague, foundation, speculative
64	2	64	16	relevance, scope, overbroad, vague, foundation, speculative
68	12	68	25	outside witness authorization, relevance, scope, overbroad, vague, foundation, speculative
70	9	70	12	relevance, scope, overbroad, vague, foundation, speculative
72	19	73	4	relevance, scope, overbroad, vague, foundation, speculative
75	20	77	8	relevance, scope, overbroad, vague, foundation, speculative
78	25	78	24	relevance, scope, overbroad, vague, foundation, speculative
82	12	82	18	relevance, scope, overbroad, vague, foundation, speculative
85	15	85	20	relevance, scope, overbroad, vague, foundation, speculative
89	4	90	12	relevance, scope, overbroad, vague, foundation, speculative

PLAINTIFFS' OBJECTIONS TO DEFENDANTS' AFFIRMATIVE DESIGNATIONS				
Start Page	Start Line	End Page	End Line	Note
91	25	92	6	relevance, scope, overbroad, vague, foundation, speculative
92	20	93	2	relevance, scope, overbroad, vague, foundation, speculative
94	12	94	18	relevance, scope, overbroad, vague, foundation, speculative
95	5	95	16	relevance, scope, overbroad, vague, foundation, speculative
97	7	97	13	relevance, scope, overbroad, vague, foundation, speculative
98	17	98	24	relevance, scope, overbroad, vague, foundation, speculative
99	12	99	17	relevance, scope, overbroad, vague, foundation, speculative
99	24	100	6	relevance, scope, overbroad, vague, foundation, speculative
104	21	106	14	relevance, scope, overbroad, vague, foundation, speculative
106	16	107	14	relevance, scope, overbroad, vague, foundation, speculative
109	20	110	10	relevance, scope, overbroad, vague, foundation, speculative
111	15	112	7	relevance, scope, overbroad, vague, foundation, speculative
112	14	112	18	relevance, scope, overbroad, vague, foundation, speculative
131	7	131	11	relevance, scope, overbroad, vague, foundation, speculative
131	22	133	9	speculative, hearsay



RESPONSES FOR STACY HARPER-AVILLA					
DEPO DATE	NOTES				
	Begin Page at	Begin Line at	End Page at	End Line at	NOTES
4/11/2019	17	18	17	18	Response: Plaintiffs' objection is overbroad and impossible to provide a respond to without Plaintiffs actually providing information as to what testimony they are objecting to. Furthermore, as a 30(b)(6) witness of the regulator responsible for enforcing the law, testimony of the DEA's understanding of the law and its requirements is relevant and will assist the trier of fact in determining whether Defendants complied with the law.
4/11/2019	18	19	19	9	Response: Question accurately describes the DEA's authorization for Ms. Harper-Avilla's testimony.
4/11/2019	31	3	31	7	Response: Question asks whether Ms. Harper-Avilla understood the reasons quota was set, provides a specific time period, and the question is squarely within the topics for which Ms. Harper-Avilla was authorized to provide testimony.
4/11/2019	33	13	33	23	Response: Plaintiffs provide no support as to why the questions are vague and confusing. Questions discuss Ms. Harper-Avilla's role in the quota process and the witness demonstrated no confusion over the questions.
4/11/2019	35	1	35	5	Response: Plaintiffs' objection to an answer rather than a question at 35:1-35:5 is inappropriate. The question simply asks for the witnesses definition of a term which the witness provides; Response 1; Response 2
4/11/2019	35	13	35	24	Response: DEA and other agencies' roles in setting the aggregate production quota is relevant to the supply chain and the amount of opioid products manufacturers were allowed to make. The questions are specific with respect to asking what other agencies are involved in setting the production quota; Response 1; Response 2
4/11/2019	39	20	39	25	Response: It has been established that Ms. Harper-Avilla managed the quota department and testified as to the training received by her staff. The staffs' ability is relevant to the determinations of quota made by DEA and the question is properly limited to the quota department; Response 1; Response 2
4/11/2019	42	22	43	4	Response: Response 2; Foundation has been established by the factors taken into by DEA. Harper-Avilla has demonstrated that these factors were considered by DEA and that she had the knowledge of what factors were considered.
4/11/2019	45	9	45	17	Response: Harper-Avilla was designated to provide testimony on the DEA's quota process, which includes its legal requirements. Ms. Harper-Avilla has demonstrated knowledge of the quota regulations and questions as to the DEA's understanding of such requirements are factual, not speculative; Response 1; Response 2; Response 3
4/11/2019	46	1	46	8	Response: Harper-Avilla was designated to provide testimony on the DEA's quota process, which includes its legal requirements. Ms. Harper-Avilla has demonstrated knowledge of the quota regulations and questions as to the DEA's understanding of such requirements are factual, not speculative; Response 1; Response 2; Response 3
4/11/2019	52	23	56	9	Response: Plaintiffs have failed to provide specific objections to specific questions; Questions are specifically tailored to other factors considered by DEA under the statute; Response 1; Response 2
4/11/2019	60	16	61	1	Response: Question was specific to time witness worked in unit; Response 1; Response 2
4/11/2019	61	22	62	6	Response: Question was specific to time witness worked in unit; Response 1; Response 2; Response 3
4/11/2019	64	2	64	16	Response: Objection to answer is inappropriate; Question was specific to time witness worked in unit; Response 1; Response 2; Response 3
4/11/2019	68	12	68	25	Response: Question was specific to time witness worked in unit; Response 1; Response 2; Response 3
4/11/2019	70	9	70	12	Response: Response 1; Response 2; Response 3
4/11/2019	72	19	73	4	Response: Response 1; Response 2; Response 3
4/11/2019	75	20	77	7	Response: Response 1; Response 2; Response 3

RESPONSES FOR STACY HARPER-AVILLA					
DEPO DATE	NOTES				
	Begin Page at	Begin Line at	End Page at	End Line at	NOTES
4/11/2019	82	12	82	18	Response: Response 1; Response 2; Response 3
4/11/2019	85	15	85	20	Response: Response 1; Response 2; Response 3
4/11/2019	89	4	90	12	Response: Response 1; Response 2; Response 3
4/11/2019	91	25	92	6	Response: Response 1; Response 2; Response 3
4/11/2019	92	20	93	2	Response: Reponse 1; Response 2; Response 3
4/11/2019	95	5	95	16	Response: Response 1; Response 2; Response 3
4/11/2019	97	7	97	13	Response: Witness testified that she recognized the format of the chart and that it accurately reflected the aggregate production quota during the relevant time period; Response 1; Response 2; Response 3
4/11/2019	98	17	98	24	Response: Witness testified that she recognized the format of the chart and that it accurately reflected the aggregate production quota during the relevant time period; Response 1; Response 2; Response 3
4/11/2019	99	12	99	17	Response: Response 1; Response 2; Response 3
4/11/2019	99	24	100	6	Response: Response 1; Response 2; Response 3
4/11/2019	104	21	106	14	Response: Response 1; Response 2; Response 3
4/11/2019	106	16	107	14	Response: Response 1; Response 2; Response 3
4/11/2019	109	20	110	10	Response: Response 1; Response 2; Response 3
4/11/2019	111	15	112	7	Response: Response 1; Response 2; Response 3
4/11/2019	112	14	112	18	Response: Response 1; Response 2; Response 3

**STACY HARPER-AVILLA RESPONSE KEY**

1. Relevance: Testimony is relevant to DEA's policies and procedures in setting the Aggregate Production Quota; Manufacturing Quota; and Procurement Quota for opioids manufactured and distributed in the United States. Plaintiffs allege that too many opioids were manufactured and distributed in the United States. As the Aggregate Production Quota limits the total amount of prescription opioids manufactured and distributed in the United States, the setting of that quota is relevant to both Plaintiffs' allegations and Defendants Defenses.
2. Foundation and Speculation: Question asks for Ms. Harper-Avilla's personal understanding of DEA's process for setting quota. Ms. Harper-Avilla ran the quota department during her career at DEA and was responsible for setting the quota during the relevant time period. For time periods when Ms. Harper-Avilla was not responsible for setting the quota, she testified on behalf of DEA as a 30(b)(6) witness.
3. Scope: Ms. Harper Avilla was authorized to testify on behalf of DEA regarding the practices and procedures related to the establishment of opioid procurement quotas and productions quotas, including her involvement in setting those quotas. She was also authorized to testify as to the basis for procurement quotas and production quotas from 1995 to 2018.